

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

QUEST LICENSING CORPORATION

Plaintiff,

v.

BLOOMBERG L.P. AND
BLOOMBERG FINANCE L.P.

Defendants.

Civil Action No.

Jury Trial Demanded

COMPLAINT

Plaintiff Quest Licensing Corporation (“Quest” or “Plaintiff”) hereby alleges patent infringement of U.S. Patent No. 7,194,468 (the “‘468 patent”) against Bloomberg L.P. and Bloomberg Finance L.P. (collectively, “Bloomberg”), as follows:

PARTIES

1. Plaintiff Quest Licensing Corporation is a Delaware corporation with a principal place of business at 19 Fortune Lane, Jericho, New York 11753.
2. Defendant Bloomberg L.P. is a Delaware limited partnership, has appointed Corporation Service Company as its registered agent for service of process, and, on information and belief, has an office in Wilmington, Delaware.
3. Defendant Bloomberg Finance L.P. is a Delaware limited partnership, is a subsidiary of Bloomberg L.P., has appointed Corporation Service Company as its registered agent for service of process, and, on information and belief, has an office in Wilmington, Delaware.

JURISDICTION AND VENUE

4. This action arises under the Patent Laws of the United States, including 35 U.S.C. § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. On information and belief, Bloomberg regularly transacts business in the District of Delaware, including by maintaining an office at 1201 N. Market St., Wilmington, Delaware 19801.

6. Bloomberg has previously admitted that it transacts business in the District of Delaware.

7. Bloomberg has previously admitted that it is subject to this Court's specific and general personal jurisdiction and that the District of Delaware is a proper venue in litigation against it under 28 U.S.C. §§ 1391(b)-(c) and 1400(b).

8. Bloomberg is therefore subject to this Court's specific and general personal jurisdiction.

9. Venue is proper pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1400(b).

THE '468 PATENT

10. Quest is the owner of all rights by assignment of the '468 patent, entitled "Apparatus and a Method for Supplying Information," with the right to pursue claims for infringement.

11. The United States Patent and Trademark office issued the '468 patent on March 20, 2007. A true and correct copy of the '468 patent is attached to this Complaint as Exhibit A.

CLAIM FOR RELIEF

COUNT I

12. Plaintiff repeats and incorporates by reference paragraphs 1-11 above.

13. Bloomberg has infringed and continues to directly infringe the claims of the '468 patent, literally or under the doctrine of equivalents, by making, using, selling, and offering for sale products that are covered by claims of the '468 patent, including its Bloomberg Anywhere

system and related hardware and software that provide mobile access to its real-time financial data.

14. Bloomberg's infringement of the '468 patent has damaged Plaintiff.

15. To the extent that facts uncovered in discovery show that Bloomberg's past infringement has been willful, Plaintiff reserves the right to seek enhanced damages and attorney fees for such past infringement.

WHEREFORE, Plaintiff requests that this Court:

- (a) enter judgment in favor of Plaintiff that Bloomberg has infringed and continues to infringe the '468 patent;
- (b) award Plaintiff all monetary relief available under the patent laws of the United States, including an award to plaintiff of the costs of this action; and
- (c) grant Plaintiff such other and further relief as this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

April 29, 2014

SMITH KATZENSTEIN & JENKINS LLP

Of Counsel:

Steven F. Molo
Ben Quarmby
MOLOLAMKEN LLP
540 Madison Avenue
New York, NY
(212) 607-8160 (telephone)
(212) 607-8161 (facsimile)

/s/ Neal C. Belgam
Neal C. Belgam (No. 2721)
800 Delaware Avenue, Suite 1000
P.O. Box 410
Wilmington, DE 19899
302-504-1688
nbelgam@skjlaw.com

Andrew R. DeVooght
Justin B. Weiner
MOLOLAMKEN LLP
300 N. LaSalle Street
Chicago, IL 60622
(312) 450-6700 (telephone)
(312) 450-6701 (facsimile)

Attorneys for Quest Licensing Corporation